



**Nebraska Public Power District**  
*Nebraska's Energy Leader*

NLS2002141  
November 25, 2002



Ellis W. Merschoff  
Regional Administrator, Region IV  
U.S. Nuclear Regulatory Commission  
611 Ryan Plaza Drive, Suite 400  
Arlington, TX 76011

**Subject:** The Strategic Improvement Plan (TIP) Revision 2  
Cooper Nuclear Station, NRC Docket 50-298, DPR-46

- References:**
1. Letter to David L. Wilson (Nebraska Public Power District) from Ellis W. Merschoff (U.S. Nuclear Regulatory Commission) dated September 20, 2002, "NRC Supplemental Inspection Report 50-298/02-07"
  2. Nebraska Public Power District letter NLS2002123 to U.S. Nuclear Regulatory Commission Document Control Desk dated October 18, 2002, "Reply to Supplemental Inspection Report No. 50-298/02-07"
  3. Nebraska Public Power District letter NLS2002029 to Ellis W. Merschoff (U.S. Nuclear Regulatory Commission) dated June 10, 2002, "Transmittal of The Strategic Improvement Plan Revision 1"

The purpose of this letter is to submit The Strategic Improvement Plan (TIP) Revision 2 for Nebraska Public Power District's (NPPD) Cooper Nuclear Station (CNS) to the Nuclear Regulatory Commission (NRC). TIP is a comprehensive improvement plan focused on progressing to excellent overall performance during the next few years. Among the many actions included in TIP are those that are appropriate for inclusion in a Confirmatory Action Letter. These actions are those in the list of regulatory commitments contained at the end of this letter.

CNS entered the Multiple/Repetitive Degraded cornerstone status in the NRC Action Matrix on April 1, 2002, primarily due to continuing issues with the implementation of the emergency preparedness (EP) program. The corrective actions completed to date and emergency response organization performance demonstrate that the White findings in the EP cornerstone have been satisfactorily addressed at CNS. Therefore, there are no EP items included in the list of regulatory

commitments at the end of this letter. However, NPPD recognizes that closure of the White findings in EP needs to be accomplished.

Also note that in a letter dated October 18, 2002 (Reference 2), CNS committed to perform several actions and confirmations in concert with the submission of TIP Revision 2. Attachment 1 to this letter documents how those specific actions and confirmations are being addressed. Additionally, TIP Revision 2 contains CNS management affirmations that reflect NPPD's commitment to manage that plan through to its completion.

The NRC staff conducted the inspection required for a licensee in the Multiple/Repetitive Degraded cornerstone status (NRC Inspection Procedure 95003) at CNS from May to August 2002 (Reference 1). Upon entry into this status in the Action Matrix, NPPD agreed to develop an improvement plan with oversight by the NRC. Since development of the TIP had begun in January 2002, it was determined that this document would serve as the aforementioned improvement plan. CNS submitted TIP Revision 1 to the NRC by Reference 3.

TIP Revision 2 consists of a body and five appendices. The body of the document describes its purpose, the focus areas for improvement, the means by which it will be implemented at CNS (including rigorous management oversight and reliance on performance indicators and assessments), and a description of the action plans. Both the action plans and performance indicators are organized by the Pillars of Excellence and then, focus area. This compilation of performance indicators was prepared so as to eliminate redundancy at the individual action plan level.

The action plans in TIP have been resource loaded. Additionally, baseline and outage work have also been resource loaded and integrated with the resource requirements of TIP Revision 2. Resource requirements are leveled over the duration of TIP to the extent practical. Change management steps required to implement TIP are also included in the action plans.

During the resource loading, scheduling and review of the TIP action plans, CNS identified the need to change the commitment to complete the Environmental Qualification (EQ) project by June 30, 2003. This project cannot be completed in that time frame, however NPPD will achieve compliance with 10 CFR 50.49 by the original commitment date. Completion of the project, involving documentation of the EQ files, is scheduled for March 30, 2004. The current action plan reflects that change.

NPPD has applied significant management attention to the development and implementation of TIP. Improvement at CNS is necessary not only to satisfy NRC expectations, but also to better ensure the viability of operating CNS to the end of, and possibly beyond, the term of its current operating license. As a result of this ongoing management attention, approximately ninety (90) of the TIP Revision 1 action steps have been closed since July 2002 while TIP Revision 2 was being developed. Additionally, ninety-five (95) Revision 2 action steps are scheduled for closure

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by the end of January 2003. TIP Revision 2 replaces TIP Revision 1. Therefore, CNS has maintained a record of the transition from Revision 1 to Revision 2. Observations made by the NRC staff during the 95003 inspection have been dispositioned during the development of TIP Revision 2. NPPD has maintained a record of those observations and their dispositions. The information demonstrating the transition from Revision 1 to Revision 2 and describing the disposition of NRC 95003 inspection observations will be available for inspection.

NPPD recognizes that, because of the volume and complexity of necessary actions, consistent and persistent senior management attention is necessary to complete the action steps on time, to improve performance, to sustain those improvements and to prevent or mitigate emergent issues from having safety significance. This is reinforced by the TIP Mission Statement, "Achieve excellence in safe, reliable and cost-effective operations." The change to the EQ commitment also reinforces the need for continuous management attention. Senior management oversight of station performance continues to be accomplished through 1) management reporting and periodic formal reviews with the CNS Site Vice President and Vice President – Nuclear, and 2) reporting of progress and station performance by the Vice President – Nuclear to the NPPD President and Chief Executive Officer, and to the NPPD Board Nuclear Committee on a monthly basis. The same senior management oversight will also be used to monitor the progress and effectiveness of TIP implementation.

NPPD and CNS management continue to be committed to the individual, team, and organizational behavior changes necessary to achieve not only the objectives set forth in TIP Revision 2, but also long-term excellence in station performance.

Should you have any questions concerning this matter, please contact me at telephone no. (402) 825-2770.

  
Michael T. Coyle  
Site Vice President

/jrs  
Attachment

cc: U.S. Nuclear Regulatory Commission (with attachment)  
Att: Document Control Desk  
Washington, D.C. 20555-0001

Senior Project Manager (with attachment)  
USNRC - NRR Project Directorate IV-1

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Senior Resident Inspector (with attachment)  
USNRC

NPG Distribution (with attachment)

**ATTACHMENT 3 LIST OF REGULATORY COMMITMENTS**

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The following table identifies those actions committed to by Nebraska Public Power District (NPPD) in this document. Any other actions discussed in the submittal represent intended or planned actions by NPPD. They are described for information only and are not regulatory commitments. Please notify the NL&S Manager at Cooper Nuclear Station of any questions regarding this document or any associated regulatory commitments.

COMMITMENT	COMMITTED DATE OR OUTAGE
<p><u>Human Performance</u>                      Implement Action Plan 5.1.4.1 – Human Performance</p> <ul style="list-style-type: none"> <li>- Develop infrastructure to determine human performance excellence, Action Steps 1 – 8</li> <li>- Improve station personnel understanding of human performance principles, Action Steps 9 – 12 &amp; 14, 15</li> <li>- Develop a site wide communications strategy that describes topics to be discussed at periodic human performance stand-downs, Action Steps 16, 17</li> <li>- Strengthen the station’s human performance root cause ability – short term actions, Action Steps 18 – 20b</li> <li>- Improve the method for measuring human performance, Action Steps 25 – 28</li> </ul>	1Q04
<p><u>Material Condition and Equipment Reliability</u>                      Resolve the long-standing equipment issues in 3 systems per Action Plans in the 5.3.1.2 series</p> <ul style="list-style-type: none"> <li>- Service Water System – Action Plan 5.3.1.2.a, Action Steps 1 – 8c, 9a – 11b, 12</li> <li>- Offsite Power/Switchyard Reliability Improvement – Action Plan 5.3.1.2.c, Action Steps 1 – 20</li> <li>- Kaman Radiation Monitors – Action Plan 5.3.1.2.j, Action Steps 1 – 3a,4, 5; immediate actions to refurbish these monitors</li> </ul>	1Q04

ATTACHMENT 3 LIST OF REGULATORY COMMITMENTS

COMMITMENT	COMMITTED DATE OR OUTAGE
<p><u>Key Modifications, Projects, Configuration</u></p> <ul style="list-style-type: none"> <li>- Complete the DBI/LBI Translation Project – Action Plan 5.3.3.1, Action Steps 1 – 11</li> <li>- Short-term improvements addressing the quality of operability determinations (OD) – Action Plan 5.2.1.2, improve the operations and shift review of ODs, provide an interim OD oversight group and improve the use of CAP data, Action Steps 1 – 9</li> <li>- Complete the near-term upgrades to the modification process – Action Plan 5.3.3.4, improve management oversight and monitoring, improve the process, establish field support expectations, and complete training, Action Steps 1a – 2c</li> <li>- Resolve the Unauthorized Modifications Issue – Action Plan 5.3.3.3, Action Steps 1 – 7</li> </ul>	<p>1Q04</p>
<p><u>Corrective Action, Operating Experience, Self-Assessment</u></p> <p>Implement Action Plan 5.2.7.1 - Improve Reinforcement of CAP Standards and Expectations</p> <ul style="list-style-type: none"> <li>- Drive behavior changes, Action Steps 1a – 1k</li> <li>- Clearly define what goes into CAP, Action Step 2a</li> <li>- Redefine classification and prioritization, Action Step 3a</li> <li>- Assign resources to continuing improvement program, Action Step 4a</li> <li>- Strengthen trending, Action Steps 5a – 5c</li> <li>- Re-evaluate CAP performance monitoring, Action Step 6a</li> <li>- Simplify process flows, Action Step 7a</li> <li>- Define overall site continuous improvement program, Action Steps 8a – 8b</li> </ul> <p>Improve the quality of root cause analysis – Action Plan 5.2.7.2</p> <ul style="list-style-type: none"> <li>- Interim action to provide industry expert root cause mentors, Action Step 5</li> </ul>	<p>1Q04</p>

**ATTACHMENT 3 LIST OF REGULATORY COMMITMENTS**

COMMITMENT	COMMITTED DATE OR OUTAGE
<ul style="list-style-type: none"> <li>- Actions to improve pre-job briefs and critiques, Action Steps 6a – 6c</li> <li>- Perform task analysis for critical steps, key decision points, standards and expectations for developing procedures, lesson plans and performance measures, Action Steps 7a – 7b</li> <li>- Improve feedback from root cause analyses, root cause procedures and training, Action Steps 8 – 12</li> <li>- Establish internal mentor team and develop a rapid response root cause methodology, Action Steps 13, 14</li> </ul> <p>Assess OER evaluations since 1994 and enter deficiencies into the Corrective Action Program – Action Plan 5.2.7.3</p> <ul style="list-style-type: none"> <li>- Perform a review of a sample of OER closeout packages since 1994, Action Step 4b</li> </ul>	
<p><u>Programs</u></p> <ul style="list-style-type: none"> <li>- Develop a BWRVIP program document and identify and implement high priority corrective actions resulting from the BWRVIP Program technical self-assessment and the interface assessment. – Action Plan 5.3.2.1, Action Steps 14a, 15</li> <li>- Complete implementation of those portions of the EQ Improvement Project required to restore compliance to 10CFR50.49. – Action Plan 5.3.2.1, Action Step 40</li> <li>- Complete detailed technical self-assessments of the following programs in 2002, Action Step 10:               <ul style="list-style-type: none"> <li>- BWRVIP</li> <li>- Erosion/Corrosion Flow Accelerated Corrosion</li> <li>- Appendix J, and</li> <li>- Welding/repair and replacement.</li> </ul> </li> <li>- Complete detailed technical self-assessments of the following programs in 2003, Action Step 11:               <ul style="list-style-type: none"> <li>- Heat Exchangers</li> <li>- Snubbers</li> <li>- Check Valves</li> <li>- Seismic Qualification</li> <li>- Probabilistic Risk Assessment (PRA)</li> </ul> </li> </ul>	4Q03

**Disposition of Applicable Commitments  
Provided in NPPD Letter NLS2002123 Dated October 18, 2002,  
"Reply to Supplemental Inspection Report No. 50-298/02-07"**

Commitment

CNS will provide the NRC with its perspectives on those areas in TIP which are within the NRC's regulatory scope and are appropriate for inclusion in a Confirmatory Action Letter (CAL).

Disposition

Addressed in Attachment 1.

Commitment

NPPD will be developing key performance indicators that 1) measure the effectiveness of the various action plans in TIP to improving plant performance and 2) will be used to indicate when CAL objectives have been satisfied.

Disposition

Addressed in Section 4.3 of TIP.

Commitment

Observations made on specific TIP action plans will be evaluated for resolution and integration into TIP Revision 2.

Disposition

Addressed in the cover letter on Page 2.

Commitment

TIP Revision 2 is being integrated with clear linkages between causal factors and Action Plan steps and between related action plans and specific deliverables. TIP Revision 2 is being resource-loaded and activities scheduled and prioritized.

Disposition

Addressed in the cover letter on Page 2 and in TIP Sections 2.1 and 3.1.

Commitment

Plans to improve the management of spare and replacement parts are being incorporated in TIP Revision 2 in an Action Plan that addresses materials management.

Disposition

Addressed in Action Plan 5.2.8.4.

Commitment

Actions to improve documentation and utilization of performance problem trends in order to improve performance are being incorporated in TIP Revision 2 in action plans that address work practices and improving CAP standards.

Disposition

Addressed in Action Plans 5.2.7.1 and 5.2.6.1.

Commitment

TIP Revision 2 will contain an Action Plan to require use of departmental performance indicators, including the accountability to both maintain the indicators and to establish and maintain performance at or above acceptable levels.

Disposition

Addressed in Action Plan 5.1.1.6.

Commitment

Corrective actions to address conflicting departmental and station priorities, policies and goals are being integrated in TIP Revision 2 in actions plans that address management effectiveness.

Disposition

Addressed in Action Plan 5.1.1.1.

Commitment

Actions to improve the lack of organizational depth and reduce its impact on effective implementation of engineering programs are being incorporated into an Action Plan in TIP Revision 2.

Disposition

Addressed in Action Plan 5.3.2.1.

Commitment

CNS Procedure 0-CNS-25 is being revised to require entry of self-assessment recommendations into CAP. Further actions including effectiveness reviews of the procedure change and performance indicators are being incorporated into TIP Revision 2.

Disposition

Addressed in Action Plan 5.1.5.1.

Commitment

Effectiveness of the use of the CAP is being addressed in the action plans related to CAP.

Disposition

Addressed in Action Plan 5.2.7.1.

Commitment

TIP Revision 2 is currently being developed to address the problems associated with prescribing "accountability behaviors" in procedures, guides or instructions.

Disposition

Addressed in Action Plan 5.1.1.1.

Commitment

Actions to correct known equipment reliability problems will be addressed in TIP Revision 2 in action plans that address equipment performance and long-standing equipment issues.

Disposition

Addressed in Action Plan 5.3.1.1 and 5.3.1.2 a-k.

Commitment

Actions to address ineffective management of component parts used in plant equipment are being developed in TIP Revision 2 in an Action Plan addressing materials management.

Disposition

Addressed in Action Plan 5.2.8.4.

Commitment

A new Action Plan, which will be included in TIP Revision 2, is being developed to address the quality and completeness of plant modification packages including effectiveness measures.

Disposition

Addressed in Action Plan 5.3.3.4.

Commitment

A new Action Plan, which will be included in TIP Revision 2, is being developed to improve the quality and completeness of operability determinations.

Disposition

Addressed in Action Plan 5.2.1.2.

Commitment

TIP, Revision 2 will ensure that improvements in the use of industry operating experience address the scope and adequacy of evaluations and the effectiveness of applying Operating Experience Reports (OER).

Disposition

Addressed in Action Plan 5.2.7.3.

Commitment

Actions to correct ineffective coordination and integration among site organizations are being addressed in TIP Revision 2 in action plans that address management effectiveness.

Disposition

Addressed in Action Plan 5.1.1.1.

Commitment

An Action Plan will be added to TIP Revision 2 to address the control of procedure revisions.

Disposition

Addressed in Action Plan 5.2.1.4.

Commitment

TIP Revision 2 will be submitted to the NRC.

Disposition

Addressed by the submittal of TIP Revision 2 with this letter.